books which had been kept in Vermont but were at the main office of the company in another state. *Held*, that for failure to produce the books the company is guilty of contempt. *Consolidated Rendering Co.* v. *State of Vermont*, 207 U. S. 541. See NOTES, p. 354.

CONSTITUTIONAL LAW — CLASS LEGISLATION — LEGISLATION AFFECTING CORPORATIONS EXCLUSIVELY. — A state statute provided that on notice a corporation might be compelled to produce its books before a grand jury. *Held*, that the statute is not invalid as making an arbitrary classification. *Consolidated Rendering Co.* v. *Vermont*, 207 U. S. 541.

For a criticism of this view, see 20 HARV. L. REV. 634.

CONTEMPT — ACTS AND CONDUCT CONSTITUTING CONTEMPT — PUBLICATION OF INACCURATE REPORT OF COURT DECISION. — The respondent, a newspaper company, published an editorial in which it unintentionally misstated the conclusion reached by the Supreme Court of Rhode Island in a recent decision. *Held*, that the respondent is guilty of contempt. *In re Providence Journal Co.*, 68 Atl. 428 (R. I.).

Statutes in some states make it a contempt to publish "grossly inaccurate" reports of judicial proceedings. It has been suggested that such a statute is merely declaratory of the common law. See *In re Chadwick*, 109 Mich. 588. On the other hand, where a statute made such a report a contempt if published pending a suit, it has been held that, while the statute does not prevent punishment for any common law contempt, the publication of a "grossly inaccurate" account of a past trial is not such contempt. *Cheadle* v. *State*, 110 Ind. 301. Even if the respondent in the present case is guilty of a technical contempt, the propriety of the decision seems doubtful. The power to punish contempt is arbitrary, and consequently should not be exercised on slight pretext, but only when it is necessary for the due administration of justice. See *Atty.-Gen.* v. *Circuit Court*, 97 Wis. 1. In the present case it is difficult to see such a compelling necessity. Certainly in no prior case has a person been held in contempt solely because he has published an inaccurate report of judicial proceedings or decisions.

CORPORATIONS — DIRECTORS — DIRECTOR'S RIGHT TO SALARY WHEN QUALIFYING WITH SHARES HELD IN TRUST. — Corporation A purchased stock in corporation B and transferred it to X, a director of A, who made a declaration of trust in favor of A. X was thereafter elected a director in B, which required each director to be a shareholder. It appeared on the records of A that the stock transfer was made to enable X to become a director in B "to represent the interests of this company." *Held*, that the A company cannot recover the salary received by X from the B company. *In re Dover Coalfield Extension, Ltd.*, [1908] 1 Ch. 65.

This decision affirms the decision of the lower court commented on in 21 HARV. L. REV. 217.

CORPORATIONS — DISSOLUTION — CORPORATION DISSOLVED BY BANKRUPTCY. — The plaintiff brought an action for libel against a publishing company, which was adjudged a bankrupt before the suit came on for trial. *Held*, that the bankruptcy does not dissolve the corporation or bar the plaintiff's remedy. *Nat'l Surety Co.* v. *Medlock*, 58 S. E. 1131 (Ga.).

A libel is a "wilful and malicious injury" which is not released by the defendant's bankruptcy. *McDonald* v. *Brown*, 23 R. I. 546; BANKRUPTCY ACT OF 1898, § 17 (2). But the abatement of any action by or against a corporation is a necessary consequence of its termination. *Nat'l Bank* v. *Colby*, 21 Wall. (U. S.) 609. There is, however, a surprising dearth of authority on the effect of bankruptcy on the existence of corporations. Mere insolvency clearly does not work a dissolution. *Boston Glass Mfty.* v. *Langdon*, 24 Pick. (Mass.) 49; *Ready* v. *Smith*, 170 Mo. 163. Bankruptcy, however, according to one case, terminates the organization. *State Savings Ass'n* v. *Kellogg*, 52 Mo. 583. *Cf.* also *Chamberlin* v. *Huguenot Mfg. Co.*, 118 Mass. 532. It may be argued that